IN THE DISTRICT COURT OF THE UNITED STATES FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
V.)	CR. NO. 2:05-cr-138-LSC
)	
JOEL THOUSSAINT)	

MOTION FOR ORDER DIRECTING THE UNITED STATES MARSHAL TO RELEASE CUSTODY OF PRISONER

Comes now the United States of America, by and through Leura Garrett Canary, United States Attorney and the undersigned Assistant United States Attorney, both for the Middle District of Alabama, and moves this Honorable Court for an order directing the United States Marshal, Middle District of Alabama, to release from their custody JOEL THOUSSAINT into the custody of Secret Service Special Agents Leighton Greenlee and/or Marty Johnson, and/or Montgomery Police Department Officers Brooke Henderson and/or Wayne Gaskin, on April 11, 2006, through July 31, 2006, so that said agents can take such prisoner into custody for the purpose of transporting him to the Office of the United States Attorney without the necessity of the presence of a Deputy United States Marshal. We further move the Court to enter an order directing Agents Leighton Greenlee, Marty Johnson, Brooke Henderson and/or Wayne Gaskin to return said prisoner into the custody of the United States Marshals Service when they have finished with him.

Respectfully submitted this 10th day of April, 2006.

LEURA G. CANARY
UNITED STATES ATTORNEY

s/Todd A. Brown TODD A. BROWN Assistant United States Attorney One Court Square, Suite 201 Montgomery, AL 36104

Phone: (334)223-7280 Fax: (334)223-7135

E-mail: todd.brown@usdoj.gov

ASB-1901-O64T

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
٧.)	CR. NO. 2:05-cr-138-LSC
)	
JOEL THOUSSAINT)	

CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Jeffrey C. Duffey, Esquire.

Respectfully submitted,

s/Todd A. Brown TODD A. BROWN Assistant United States Attorney One Court Square, Suite 201 Montgomery, AL 36104 Phone: (334)223-7280

Fax: (334)223-7135

E-mail: todd.brown@usdoj.gov

ASB-1901-O64T